

1 BRIAN J. STRETCH (CABN 163973)
United States Attorney

2 BARBARA J. VALLIERE (DCBN 439353)
3 Chief, Criminal Division

4 JEFFREY D. NEDROW (CABN 161299)
PATRICK DELAHUNTY (CABN 257439)
5 Assistant United States Attorneys

6 150 Almaden Boulevard, Suite 900
San Jose, California 95113
7 Telephone: (408) 535-5045
FAX: (408) 4535-5066
8 Email: jeff.nedrow@usdoj.gov

9 Attorneys for United States of America

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN JOSE DIVISION

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 VILASINI GANESH and
17 GREGORY BELCHER,

18 Defendants.
19

CASE NO. CR 16-00211 LHK

THE PARTIES' JOINT PROPOSED
FORM OF VERDICT

20 The parties hereby submit the attached proposed verdict form for use in the above-captioned
21 case, with one area of disagreement. Belcher has requested that the defendants' names be articulated in
22 a bold font. The government disagrees with this approach as unnecessary, and requests that the verdict
23 form be submitted to the jury as is, without any bold font highlighting the defendants' names. The
24 parties are otherwise in agreement with respect to the substance of the verdict form.

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26 //
27
28

1 DATED: October 11, 2017

Respectfully Submitted,

2
3 BRIAN J. STRETCH
United States Attorney

4 /s/_____
5 JEFFREY D. NEDROW
6 PATRICK DELAHUNTY
Assistant United States Attorney

7
8 /s/_____
9 NAOMI CHUNG
10 Attorney for Gregory Belcher

11 /s/_____
12 DANIEL HOROWITZ
13 Attorney for Vilasini Ganesh
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COUNT ONE

1. We, the Jury, find each of the defendants listed below,

GUILTY

NOT GUILTY

VILASINI GANESH

GREGORY BELCHER

(place an X on the appropriate line) of Conspiracy to Commit Health Care Fraud, from at least January 2008 through in or about January 2015, in violation of Title 18, United States Code, Section 1349, as charged in Count One of the Superseding Indictment.

COUNT TWO

2. We, the Jury, find defendant VILASINI GANESH,

GUILTY

NOT GUILTY

(place an X on the appropriate line) of Health Care Fraud, as to a claim for reimbursement submitted to Anthem Blue Cross for care claimed to have been provided on June 28, 2012 regarding beneficiary S.S., in violation of Title 18, United States Code, Section 1347, as charged in Count Two of the Superseding Indictment.

COUNT THREE

3. We, the Jury, find defendant VILASINI GANESH,

GUILTY

NOT GUILTY

(place an X on the appropriate line) of Health Care Fraud, as to a claim for reimbursement submitted to Blue Shield for care claimed to have been provided on March 5, 2012 regarding beneficiary M.K., in violation of Title 18, United States Code, Section 1347, as charged in Count Three of the Superseding Indictment.

1 COUNT FOUR

2 4. We, the Jury, find defendant VILASINI GANESH,

3 GUILTY NOT GUILTY

4 _____
5 (place an X on the appropriate line) of Health Care Fraud, as to a claim for reimbursement submitted to
6 Cigna for care claimed to have been provided on December 30, 2012 regarding beneficiary M.H., in
7 violation of Title 18, United States Code, Section 1347, as charged in Count Four of the Superseding
8 Indictment.

9
10 COUNT FIVE

11 5. We, the Jury, find defendant VILASINI GANESH,

12 GUILTY NOT GUILTY

13 _____
14 (place an X on the appropriate line) of Health Care Fraud, as to a claim for reimbursement submitted to
15 UnitedHealthcare for care claimed to have been provided on February 17, 2014 regarding beneficiary
16 A.D., in violation of Title 18, United States Code, Section 1347, as charged in Count Five of the
17 Superseding Indictment.

18
19 COUNT SIX

20 6. We, the Jury, find defendant VILASINI GANESH,

21 GUILTY NOT GUILTY

22 _____
23 (place an X on the appropriate line) of Health Care Fraud, as to a claim for reimbursement submitted to
24 Aetna for care claimed to have been provided on September 21, 2012 regarding beneficiary S.K, in
25 violation of Title 18, United States Code, Section 1347, as charged in Count Six of the Superseding
26 Indictment.

1 COUNT SEVEN

2 7. We, the Jury, find defendant GREGORY BELCHER,

3 GUILTY NOT GUILTY

4 _____
5 (place an X on the appropriate line) of Health Care Fraud, as to a claim for reimbursement submitted to
6 Cigna for care claimed to have been provided on October 9, 2012 regarding beneficiary M.H., in
7 violation of Title 18, United States Code, Section 1347, as charged in Count Seven of the Superseding
8 Indictment.

9
10 COUNT EIGHT

11 8. We, the Jury, find defendant GREGORY BELCHER,

12 GUILTY NOT GUILTY

13 _____
14 (place an X on the appropriate line) of Health Care Fraud, as to a claim for reimbursement submitted to
15 Cigna for care claimed to have been provided on June 19, 2013 regarding beneficiary M.H., in violation
16 of Title 18, United States Code, Section 1347, as charged in Count Eight of the Superseding Indictment.

17
18 COUNT NINE

19 9. We, the Jury, find defendant GREGORY BELCHER,

20 GUILTY NOT GUILTY

21 _____
22 (place an X on the appropriate line) of Health Care Fraud, as to a claim for reimbursement submitted to
23 Blue Shield for care claimed to have been provided on May 19, 2014 regarding beneficiary M.K., in
24 violation of Title 18, United States Code, Section 1347, as charged in Count Nine of the Superseding
25 Indictment.

COUNT TEN

10. We, the Jury, find defendant GREGORY BELCHER,

GUILTY NOT GUILTY

(place an X on the appropriate line) of Health Care Fraud, as to a claim for reimbursement submitted to Blue Shield for care claimed to have been provided on June 22, 2014 regarding beneficiary A.B., in violation of Title 18, United States Code, Section 1347, as charged in Count Ten of the Superseding Indictment.

COUNT ELEVEN

11. We, the Jury, find defendant VILASINI GANESH,

GUILTY NOT GUILTY

(place an X on the appropriate line) of False Statements Relating to Health Care Matters, as to the December 23, 2013 submission to Anthem Blue Cross of claimed care regarding beneficiary S.S., in violation of Title 18, United States Code, Section 1035, as charged in Count Eleven of the Superseding Indictment.

COUNT TWELVE

12. We, the Jury, find defendant VILASINI GANESH,

GUILTY NOT GUILTY

(place an X on the appropriate line) of False Statements Relating to Health Care Matters, as to the August 10, 2013 submission to Blue Shield of claimed care regarding beneficiary M.K., in violation of Title 18, United States Code, Section 1035, as charged in Count Twelve of the Superseding Indictment.

COUNT THIRTEEN

13. We, the Jury, find defendant VILASINI GANESH,

GUILTY

NOT GUILTY

(place an X on the appropriate line) of False Statements Relating to Health Care Matters, as to the March 29, 2013 submission to Cigna of claimed care regarding beneficiary M.H., in violation of Title 18, United States Code, Section 1035, as charged in Count Thirteen of the Superseding Indictment.

COUNT FOURTEEN

14. We, the Jury, find defendant VILASINI GANESH,

GUILTY

NOT GUILTY

(place an X on the appropriate line) of False Statements Relating to Health Care Matters, as to the May 12, 2014 submission to UnitedHealthcare of claimed care regarding beneficiary A.D., in violation of Title 18, United States Code, Section 1035, as charged in Count Fourteen of the Superseding Indictment.

COUNT FIFTEEN

15. We, the Jury, find defendant, VILASINI GANESH,

GUILTY

NOT GUILTY

(place an X on the appropriate line) of False Statements Relating to Health Care Matters, as to the December 10, 2012 submission to Aetna of claimed care regarding beneficiary S.K., in violation of Title 18, United States Code, Section 1035, as charged in Count Fifteen of the Superseding Indictment.

COUNT SIXTEEN

16. We, the Jury, find defendant, GREGORY BELCHER,

GUILTY NOT GUILTY

(place an X on the appropriate line) of False Statements Relating to Health Care Matters, as to the November 26, 2013 submission to Cigna of claimed care regarding beneficiary M.H., in violation of Title 18, United States Code, Section 1035, as charged in Count Sixteen of the Superseding Indictment.

COUNT SEVENTEEN

17. We, the Jury, find defendant, GREGORY BELCHER,

GUILTY NOT GUILTY

(place an X on the appropriate line) of False Statements Relating to Health Care Matters, as to the August 8, 2014 submission to Blue Shield of claimed care regarding beneficiary M.K., in violation of Title 18, United States Code, Section 1035, as charged in Count Seventeen of the Superseding Indictment.

COUNT EIGHTEEN

18. We, the Jury, find each of the defendants listed below,

GUILTY NOT GUILTY

VILASINI GANESH

GREGORY BELCHER

(place an X on the appropriate line) of Conspiracy to Commit Money Laundering, from in or about May 2011, and continuing to in or about January 2014, in violation of Title 18, United States Code, Section 1956(h), as charged in Count Eighteen of the Superseding Indictment.

COUNT NINETEEN

19. We, the Jury, find each of the defendants listed below,

GUILTY

NOT GUILTY

VILASINI GANESH

GREGORY BELCHER

(place an X on the appropriate line) of Money Laundering, as to the August 8, 2011 purchase of Cashier's Check No. 432311932 from the Bank of America Account ending in xx8753, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i), as charged in Count Nineteen of the Superseding Indictment.

COUNT TWENTY

20. We, the Jury, find each of the defendants listed below,

GUILTY

NOT GUILTY

VILASINI GANESH

GREGORY BELCHER

(place an X on the appropriate line) of Money Laundering, as to the September 23, 2011 purchase of Cashier's Check No. 422859367 from the Bank of America Account ending in xx8753, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i), as charged in Count Twenty of the Superseding Indictment.

COUNT TWENTY-ONE

21. We, the Jury, find each of the defendants listed below,

GUILTY

NOT GUILTY

VILASINI GANESH

GREGORY BELCHER

(place an X on the appropriate line) of Money Laundering, as to the October 19, 2011 purchase of Cashier's Check No. 433613797 from the Bank of America Account ending in xx8753, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i), as charged in Count Twenty-One of the

Superseding Indictment.

COUNT TWENTY-TWO

22. We, the Jury, find each of the defendants listed below,

GUILTY

NOT GUILTY

VILASINI GANESH

GREGORY BELCHER

(place an X on the appropriate line) of Money Laundering, as to the November 29, 2011 purchase of Cashier's Check No. 422859603 from the Bank of America Account ending in xx8753, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i), as charged in Count Twenty-Two of the Superseding Indictment.

COUNT TWENTY-THREE

23. We, the Jury, find each of the defendants listed below,

GUILTY

NOT GUILTY

VILASINI GANESH

GREGORY BELCHER

(place an X on the appropriate line) of Money Laundering, as to the December 16, 2011 purchase of Cashier's Check No. 422859519 from the Bank of America Account ending in xx8753, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i), as charged in Count Twenty-Three of the Superseding Indictment.

COUNT TWENTY-FOUR

24. We, the Jury, find each of the defendants listed below,

GUILTY

NOT GUILTY

VILASINI GANESH

GREGORY BELCHER

(place an X on the appropriate line) of Money Laundering, as to the November 19, 2013 deposit of
Cashier's Check Nos. 432311932, 422859367, 433613797, 422859603, and 422859519 into the Bank of
the West Account ending in xx7654, in violation of Title 18, United States Code, Section
1956(a)(1)(B)(i), as charged in Count Twenty-Four of the Superseding Indictment.

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*

When this form is completed, the jury foreperson should date and sign it and advise the Court
that you have reached a verdict.

Dated: _____

FOREPERSON